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11 Counsel to Debtors
12 Alan Gomperts, Daniel Halevy, and
13 Susan Halevy

14 **UNITED STATES BANKRUPTCY COURT**

15 **CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION**

16 In re:

17 SEATON INVESTMENTS, LLC, *et al.*,

18 Debtors and Debtors in
19 Possession.

20 Lead Case No. 2:24-bk-12079-VZ

21 Jointly Administered with Case Nos.:
22 2:24-bk-12080-VZ; 2:24-bk-12081-VZ;
23 2:24-bk-12082-VZ; 2:24-bk-12091-VZ;
24 2:24-bk-12074-VZ; 2:24-bk-12075-VZ
25 and 2:24-bk-12076-VZ

26 Chapter 11

- 1 _____
- 2 Affects All Debtors.
- 3 Affects Seaton Investments, LLC
- 4 Affects Colyton Investments, LLC
- 5 Affects Broadway Avenue Investments, LLC
- 6 Affects SLA Investments, LLC
- 7 Affects Negev Investments, LLC
- 8 Affects Alan Gomperts
- 9 Affects Daniel Halevy
- 10 Affects Susan Halevy
- 11
- 12
- 13 _____

**STIPULATION TO CONTINUE
HEARING ON MOTION TO
AUTHORIZE USE OF CASH
COLLATERAL PURSUANT TO 11
U.S.C. § 363(C)(2)**

Date: July 23, 2024
Time: 11:00 a.m.
Crtrm.: 1368

14 SLA Investments, LLC (“SLA”), Negev Investments, LLC (“Negev”), Susan Halevy
15 (“Susan” or “Susan Halevy”), and Alan Gomperts (“Alan” or “Alan Gomperts”), debtors and
16 debtors-in-possession (the “Debtors”), Archway Real Estate Income Fund I REIT, LLC, fka
17 Archway Real Estate Income Fund I SPE I, LLC (“Archway”), Wells Fargo Bank National West
18 (“Wells Fargo”), and Harvest Small Business Finance, LLC (“Harvest”) (Archway, Wells Fargo
19 and Harvest, collectively, the “Lenders”— in the above-entitled jointly administered chapter 11
20 bankruptcy cases (the “Bankruptcy Cases”) hereby stipulate as follows:

21

22 **RECITALS**

- 23 1. On March 18 and 19, 2024 the Debtors filed their jointly administered voluntary
24 chapter 11 cases.
- 25 2. On June 7, 2024 the Debtors filed their *Motion By Affected Debtors For Entry Of An*
26 *Order Authorizing Use Of Cash Collateral Pursuant To 11 U.S.C. § 363(c)(2)* (“Motion”) (doc. no.
27 87).
- 28 3. The initial hearing on the Motion was held on June 20, 2024 on shortened time.

4. A continued hearing was scheduled for July 23, 2024, at 11:00 a.m.

5. On July 18, 2024, the Court entered its order authorizing the Debtors' interim use of cash collateral through July 23, 2024 (doc. no. 127) (the "Interim Cash Collateral Order").

6. The Lenders and the Debtors are engaged in negotiations regarding the terms of long-term authorization for the Debtors' use of cash collateral and require more time to negotiate those terms.

7. Accordingly the Lenders and the Debtors enter into this stipulation.

STIPULATION

8. The foregoing recitals are incorporated herein.

9. The Lenders and the Debtors stipulate and agree that the status conference on the Motion should be further continued from July 23, 2023 to August 27, 2024, at 11:00, or to another date convenient to the Court that is approximately one month after July 23, 2024.

10. The Lenders and the Debtors stipulate and agree that the Debtors' authorization to use cash collateral should be extended through the same date as the further continued status conference on interim cash collateral use.

11. The Lenders and the Debtors stipulate and agree that all the terms of the Interim Cash Collateral Order, including specifically the grants of adequate protection including the Replacement Liens and limitations on use of cash collateral, shall remain in full force and effect and unchanged during the continued interim period between July 23, 2024, and the continued status conference on interim cash collateral use.

[Continued on Next Page]

12. This stipulation is without prejudice to the parties entering into other or further
1 stipulations subject to Court approval.
2

3 **SO STIPULATED.**

4 Dated: July 19, 2024

SAUL EWING LLP

6 By: /s/ Zev Shechtman
7 Zev Shechtman, Attorneys for Individual Debtors

8 Dated: July 21 2024

WEINTRAUB ZOLKIN TALERICO & SELTH LLP

10
11 By: 
12 Derrick Talerico, Attorneys for Corporate Debtors

13 Dated: July __, 2024

FRANDZEL ROBINS BLOOM & CSATO, L.C.

15 By: _____
16 Gerrick M. Warrington, attorneys for ARCHWAY
17 REAL ESTATE INCOME FUND I REIT, LLC, fka
Archway Real Estate Income Fund I SPE I, LLC

18 Dated: July __, 2024

HEMAR, ROUSSO & HEALD, LLP

20 By: _____
21 Jacqueline L. James , attorneys for HARVEST
22 SMALL BUSINESS FINANCE, LLC

23 Dated: July __, 2024

ALDRIDGE PITE, LLP

25 By: _____
26 Todd S. Garan, attorneys for WELLS FARGO
27 BANK NATIONAL WEST

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7 Zev Shechtman, Attorneys for Individual Debtors
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9 Dated: July __, 2024

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11 By: _____
12 Derrick Talerico, Attorneys for Corporate Debtors
13

14 Dated: July 22, 2024

FRANDZEL ROBINS BLOOM & CSATO, L.C.

15 By: 
16 Gerrick M. Warrington, attorneys for ARCHWAY
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18 Archway Real Estate Income Fund I SPE I, LLC
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23 SMALL BUSINESS FINANCE, LLC
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22 SMALL BUSINESS FINANCE, LLC

23 Dated: July 22 2024

ALDRIDGE PITE, LLP

24 By: _____
25 
26 Todd S. Garan, attorneys for WELLS FARGO
27 BANK NATIONAL WEST

1 **PROOF OF SERVICE OF DOCUMENT**

2 I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding.
3 My business address is:

4

Saul Ewing LLP, 1888 Century Park East, Suite 1500, Los Angeles, CA 90067

5 A true and correct copy of the document entitled: **STIPULATION TO CONTINUE**
6 **HEARING ON MOTION TO AUTHORIZE USE OF CASH COLLATERAL PURSUANT**
7 **TO 11 U.S.C. § 363(C)(2)** will be served or was served (a) on the judge in chambers in the form
8 and manner required by LBR 5005-2(d); and (b) in the manner stated below:

9 **1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING**

10 **(NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served
11 by the court via NEF and hyperlink to the document. On **July 22, 2024**, I checked the CM/ECF
12 docket for this bankruptcy case or adversary proceeding and determined that the following persons
13 are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated
14 below:

15 **SEE ATTACHED.**

16 Service information continued on attached page

17 **2. SERVED BY UNITED STATES MAIL:**

18 On (date), I served the following persons and/or entities at the last known addresses in this
19 bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed
20 envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing
21 the judge here constitutes a declaration that mailing to the judge will be completed no later than 24
22 hours after the document is filed.

23 **3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FAXSIMILE**

24 **TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to
25 F.R.Civ.P. 5 and/or controlling LBR, on **July 22, 2024**, I served the following persons and/or
26 entities by personal delivery, overnight mail service, or (for those who consented in writing to
27 such service method), by facsimile transmission and/or email as follows. Listing the judge here
28 constitutes a declaration that personal delivery on, or overnight mail to, the judge will be
completed no later than 24 hours after the document is filed.

29 **BY PERSONAL DELIVERY:**

30 Hon. Vincent P. Zurzolo
31 U.S. Bankruptcy Court
32 Roybal Federal Building
33 255 E. Temple Street, (BIN OUTSIDE SUITE 1360)
34 Los Angeles, CA 90012

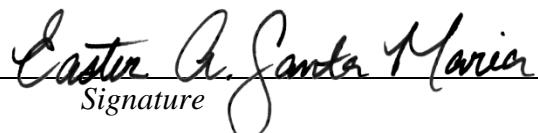
35 I declare under penalty of perjury under the laws of the United States that the foregoing is true and
36 correct.

37 July 22, 2024

38 *Date*

39 Easter A. Santa Maria

40 *Printed Name*

41 
42 *Easter A. Santa Maria*

43 *Signature*

SERVICE BY NEF:

Tanya Behnam on behalf of Creditor Korth Direct Mortgage Inc.
tbehnam@polsinelli.com,
tanyabehnam@gmail.com;ccripe@polsinelli.com;ladocketing@polsinelli.com

Carol Chow on behalf of Debtor Alan Gomperts
Carol.Chow@saul.com, easter.santamaria@saul.com

Carol Chow on behalf of Debtor Daniel Halevy
Carol.Chow@saul.com, easter.santamaria@saul.com

Carol Chow on behalf of Debtor Susan Halevy
Carol.Chow@saul.com, easter.santamaria@saul.com

Turner Falk on behalf of Debtor ALAN GOMPERTS
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ch11ecf@aldrigepte.com, TSG@ecf.inforuptcy.com;tgaran@aldrigepte.com

Jacqueline L James on behalf of Creditor Harvest Small Business Finance, LLC
jjames@hrhllaw.com

Jacqueline L James on behalf of Interested Party Harvest Small Business Finance, LLC
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Kelly L Morrison on behalf of U.S. Trustee United States Trustee (LA)

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dtalerico@wztslaw.com, maraki@wztslaw.com,sfritz@wztslaw.com

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dtalerico@wztslaw.com, maraki@wztslaw.com,sfritz@wztslaw.com

United States Trustee (LA)
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Jennifer C Wong on behalf of Interested Party Courtesy NEF
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